

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

Marc Jon Manchon, *
*
Plaintiff, *
v. * **Docket No. 1:24-cv-00347-LM-AJ**
*
Town of Charlestown, NH, et al. *
*
Defendants. *

DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION TO SEAL

Defendants file this response to Plaintiff's motion to seal (ECF Doc. 15) and state as follows:

1. On March 7, 2025, Plaintiff filed a motion to seal, which included a recitation of categories of information Plaintiff requests that the Court seal. (ECF Doc. 15.) On March 10, 2025, the Court provisionally sealed Plaintiff's motion itself while taking the matter under advisement. The Court further ordered Plaintiff to identify which pleadings specifically contained information he seeks to seal.

2. As a preliminary matter, Defendants have no knowledge of any allegations that form the basis of Plaintiff's motion or the source of those allegations.¹

3. Turning to Plaintiff's requested relief, Defendants take no position on Plaintiff's motion so long as any sealing of information comports with Federal Rule of Civil Procedure 5.2, which contains the framework for information that is subject to redaction under such circumstances. Given the breadth of Plaintiff's requested relief and to the extent Plaintiff's

¹ Because Plaintiff's motion has been provisionally sealed, Defendants do not recite the bases for Plaintiff's motion within this response.

requested relief exceeds the parameters of Federal Rule of Civil Procedure 5.2, Plaintiff's requested relief should be denied.²

4. Finally, given the uncertainty associated with the scope of Plaintiff's requested relief, Defendants reserve the right to address any proposed redactions with the Court after conferring in good faith with Plaintiff in the event such redactions exceed the scope of Federal Rule of Civil Procedure 5.2 or any order from this Court.

5. Due to the brevity of this response, no memorandum of law accompanies it. See Local Rule 7.1(a)(2).

WHEREFORE Defendants respectfully request that this Court:

- A. Consider this response; and
- B. Grant such further relief that is just.

Respectfully submitted,

**Town of Charlestown, NH Police Department,
Patrick Connors and Sirena Relihan**

By Their Attorneys,
Gallagher, Callahan & Gartrell, P.C.

Dated: March 21, 2025

By: /s/ Matthew V. Burrows
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² While it does not appear so on the face of Plaintiff's motion, to the extent that Plaintiff seeks to restrict Defendants' ability to obtain discoverable information through the discovery process that may be sensitive in nature, such a request should be denied, given the ability to disclose such information in discovery pursuant to an appropriate protective order and the ability to provide the information to the Court, as may be appropriate, under seal.

CERTIFICATE OF SERVICE

I certify that a copy of this filing was served this date upon Plaintiff via the Court's electronic filing system.

Dated: March 21, 2025

By: /s/ Matthew V. Burrows
Matthew V. Burrows, Esq.